

EXHIBIT C-1

Wednesday, November 4, 2020

To: Trial court of the United States for the District of Puerto Rico

From: Felix Rivera Clemente

Social Security number: [REDACTED]-6753

Driver's License number: [REDACTED] 070

Address: HC2 P.O. Box 9045 Loiza, PR 00772

Telephone: 787-525-9643

*Employee of the Department of Transportation and Public Works,
State Government,
Division of Traffic Regulation
Fifth floor, Ave. De Diego South Building
Minillas Government Center
San Juan, P.R. 00940
Claims 6725, 7490 and 7415
Proofs of Claim*

RECEIVED
NOV 10 2020
PRIME CLERK LLC

Claim 7415

There is a wage differential of \$50,540. After the Office of Industrial Relations gave me the check for \$53,105.65, an employee named Pedro informed me that it was incorrect and a few weeks later they gave me a check for \$2,470.65. The problem was that [...]

[...] the Office of Finances and Payroll included another wage differential in that check that they owed me from 1994 and had not paid but they did not inform me. In order to correct that error they have to make me a check for \$50,540.00. I have hired lawyers and they don't want to pay me that check. They even sent me two checks for \$0.00 which I am sending as evidence in the case.

Case 2

Juan Perez Colón

KAC 90 – 487 (905)

which was heard at the Trial Court, Superior Court of San Juan

They have paid me \$12,698.02 and the Department of Public Works owes me \$17,301.92 plus interest and the change in my salary.

I am including evidence for the case herein.

Case 3 or Claim

Civil No. 2007 – 05 – 1167

Involuntary Transfer

Felix Rivero Clemente

Vs.

Department of Transportation and Public Works of the State Government

*This was being heard before the Public Service Human Resources Management System
Appeals Commission [Comisión Apelativa del Sistema de Administración de Recursos
Humanos del Servicio Publico]*

I filed suit against the employer and some of its directors.

They were planning on transferring me from the Office of the sign making workshop

Discrimination for:

Age

Political discrimination

Race

Social status

Stalking

Abuse of power

Intervening, restraining, restricting the rights of their employees
Failure to accept or comply with an arbitration award
Refusing to submit complaints and grievances and other disputes to the procedures set forth in the agreement
Discriminating against employees because they have filed or brought a complaint against them.
Failure to maintain a neutral attitude
Suspending payments where there was a balance of vacation and sick leave.
Persecution
Invasion of privacy
Harassment in the workplace
Damage to my automobiles
For which I am filing a lawsuit against my employer for the amount of \$60,000,000.
All of this has been going on since 2007.

Commonwealth of Puerto Rico

HOURS AND INCOME

Descripción	Sueldo	Horas	Ingresos	Horas	Ingresos
Pago Anticipo Regular			1,858.50		1,858.50
Pago en Salario Regular			0.00	240.00	3,693.85

TAXES

Descripción	Corriente	Acumulado
Fed MED-EE	26.93	80.3
Fed GASD-EE	115.23	344.25
PR Withholding	148.68	175.11

WITHHOLDINGS

Descripción	Corriente	Acumulado
GPR Plan de Retiro	152.76	480.47

GENERAL WITHHOLDINGS

Descripción	Corriente	Acumulado
Ahorros-AEELA	55.76	166.28
AF-Asoc Emp-ELA-Prest Regular	0.00	555.91
CO-COOP OBRAS PUBLICAS	0.00	377.64
DAL FONDOS UNIDOS	0.00	7.50
RC-Prea Pers Ret Cere-E Clasic	0.00	338.94
AE Seguro por Muerte Asoc ELA	0.00	1.40
AS-UIRCE	0.00	1.50
AS-ASOC EMP GER Y SUP-DTOP	0.00	12.00
SM-NATIONAL LIFE	0.00	17.00

EMPLOYER BENEFITS PAID

Descripción	Corriente	Acumulado
GPR Plan de Retiro	172.38	515.00
FSED Disables Plan	120.80	364.00
SM-NATIONAL LIFE	0.00	200.00

TOTAL GROSS 4,552.35
TOTAL TAXES 344.25
TOTAL WITHHOLDINGS 209.20
NET PAYMENT 1,358.90

DISTRIBUTION OF NET PAYMENT

Descripción	Corriente	Acumulado
PTD HORAS	0.00	0.00
Balance inicial	0.00	0.00
+ Acumulado	0.00	0.00
Utilizado	0.00	0.00
Troncos	0.00	0.00
Balance Final	0.00	0.00

DEPARTMENT OF TREASURY
Intendente Ramirez Building
San Juan PR 00902-4140

Commonwealth of Puerto Rico
049 - Dept. Transport. And Pub. Works

Date: Feb 4, 2009 Amount: \$1,358.00 *****

Check No. 1412

Pay to the order of ONE THOUSAND THREE HUNDRED FIFTY-EIGHT DOLLARS AND 09/100

FELIX RIVERACLEMENTE
BO. TORRECILLA BAJA CARR. 187
KM 6.4
LOIZA PR 00772

Location: Traffic Signs by Computer Section

Not valid six months after its issuance

Secretary of the Treasury

ACHIEVEMENTS ATTAINED BY JUDGMENT IN
CASE KAC-1990-0487 - JUAN PÉREZ COLÓN CASE

- 1) Voiding the directive issued by OCAP in Special Memorandum 5-86 to implement the minimum wage adjustment.
- 2) Permanent injection concept where the D.T.O.P. is ordered to keep the salary structure updated in accordance with the increases in the minimum wage.
- 3) The payment of all salaries and wages foregone due to the inoperability of the scales:


The period from April 1986 to 1995 is calculated according to OCAP model scales applied to the different increases.

With respect to the scale that became effective as of January 2000, it will be effective as of September 1, 1997.

The same procedure must be followed with respect to the increase that becomes effective in September 2000.

Reinstate salary increases that were eliminated when the minimum wage was implemented by adding them after assigning the positions to the scales.

- 4) Pay accrued legal interest from the date of filing of the date of the lawsuit.
- 5) The attorneys are granted a term to report individual debts.
- 6) Awarded costs and attorney's fees.

Commonwealth of Puerto Rico 049 - Dept. Trans. and Pub. Works						DATA IMP: Federal PR Estado Civil: Married Married Concesiones: 0 5 Pct. Adcl.: Cant. Adcl.:		
						TAXES		
Corriente			Acumulado			Corriente		
Descripción	Sueldo	Horas	Ingresos	Horas	Ingresos	Descripción	Corriente	Acumulado
Pago de Salarios Regulares			0.00	975.00	11,760.00	Fed MED:EE	0.00	170.52
						Fed OASDI:EE	0.00	493.92
Total: 60.00						Total: 664.44		
WITHHOLDINGS			GENERAL WITHHOLDINGS			EMPLOYER BENEFITS PAID		
Descripción	Corriente	Acumulado	Descripción	Corriente	Acumulado	Descripción	Corriente	Acumulado
GPR Plan de Retiro	0.00	973.20	AE-Asoc Emp ELA-Prest Regular	0.00	2,341.12	SM First Medical Health Plan	600.00	998.00
			CO-COOP OBRAS PUBLICAS	0.00	2,859.19	GPR Plan de Retiro	0.00	1,090.80
			DM-FONDOS UNIDOS	0.00	32.50	FSED Disability Plan	0.00	754.40
			RC-Pres Pers Ret Cen-E Clasif	0.00	1,594.97	SM-NATIONAL LIFE	0.00	280.00
			AE-Seguro por Muerte Asoc ELA	0.00	45.60			
			AS-UITICE	0.00	6.50			
			AS-ASOC EMP GER Y SUP DTOP	0.00	52.00			
			Ahorros-AEELA	0.00	352.80			
Total: TOTAL GROSS			Total: TOTAL TAXES			Total: TOTAL WITHHOLDINGS NET PAYMENT		
Corriente: 0.00			Corriente: 0.00			Corriente: 0.00		
Acumulado: 11,760.00			Acumulado: 664.44			Acumulado: 8,257.88		
PTO HORAS ACUM			DISTRIBUTION NET PAYMENT			Total: 0.00		
Balance Inicial: 0.0								
+ Acumulado:								
- Utilizado:								
- Donada:								
+ Ajustes:								
Balance Final: 0.0								
MENSAJE:								
Modelo SC-784-1 Nov. 09.2005 			DEPARTMENT OF TREASURY Intendente Ramirez Building			1A Commonwealth of Puerto Rico 049 - Dept. Transport. And Pub. Works Date: 06/19/2012 Amount: \$0.00 *****		
Pague a la Orden De FELIX RIVERA CLEMENTE HC 1 BOX 9045 LOIZA PR 00772 Location: Traffic Signs by Computer Section BGF			***NO AND 00/100 DOLLARS*** Not valid six months after its issuance			Check No. 5041 Secretary of the Treasury		

Commonwealth of Puerto Rico
PUBLIC SERVICE LABOR RELATIONS COMMISSION
P. O. BOX 13934 SAN JUAN, PUERTO RICO, 00908-3934
TEL. 723-4242/FAX 723-4699

DEPARTMENT OF TRANSPORTATION
AND PUBLIC WORKS

(AGENCY)
AND

UNITED PUBLIC SERVANTS OF
PUERTO RICO/AFSCME
(UNION)

RESOLUTION

CASE NO.: AQ-04-345

IN RE: Violation of Agreement
Article XIX
Félix Rivera Clemente

ARBITRATOR: Grace M. Díaz Pastrana

RESOLUTION

Having heard and considered the MOTION TO CLOSE, requesting the closure with prejudice of the above-captioned matter, received on December 10, 2004, signed by Mr. Moisés Rivera Oneill, Director of the Office of Industrial Relations of the Department of Transportation and Public Works and after having agreed with Mrs. Sandra Pacheco, President of the United Public Servants Union of Puerto Rico, same is hereby **GRANTED**.

1. The Agency is ordered to pay the employee Félix Rivera Clemente the differential in the amount of \$ 2,470.65.
2. Accordingly, the case before this arbitration forum is dismissed with prejudice.

TO BE FILED AND SERVED.

In San Juan, Puerto Rico, this 16th day of December 2004.

[signature]
Grace M. Diaz Pastrana
Arbitrator

CERTIFICATION

I CERTIFY: that on this date, December 16, 2004, this Resolution has been sent by regular mail to the following:

Mr. Moisés Rivera O'Neill

Director

Industrial Relations Office

Department of Transportation and Public Works

P.O. Box 41269

San Juan, P.R. 00940-1269

United Public Servants / AFCSME

Mrs. Sandra Pacheco

President SPU

P.O. Box 13695

San Juan, P.R. 00908-3695

In San Juan, Puerto Rico on this date, December 16, 2004.

[signature]

Maritza Questell Montes
Secretary

TO: Rosana Rosario Otero
Director of the Human Resources Office
4th floor, South Tower, Minillas
Santurce, PR 00940

FROM: Felix Rivera Clemente
Traffic Regulation Sign Shop Supervisor

SUBJECT: **Salary differential, incorrect amount paid (Violation of agreement) SPU-2004,
Article 10 XIX from December 7, 2000 to August 16, 2004.**

DATE: June 20, 2012

On May 10, 2005, for a differential payment of August 16, 2004, retroactive to December 17, 2000, a correct payment of \$53,010.00 was made to me at the Industrial Relations Office in the basement of the South Tower in Minilla, which is currently located on Floor 9 of this same tower. Please recalculate the amount for me so that the Finance Office can correct the error made by the Industrial Relations Office on that occasion. $\$53,010.00 - \$2,470.65 = \$50,539.35$, salary as a Lettering Machine Operator, which was my previous classification, \$880.00 per month, and change the classification to Sign Shop Supervisor with a salary of \$1,760.00 per month. That is a difference of $\$1,760.00 - \$880.00 = \$880.00$ for the time I was there, from December 7, 2000 to the August 16, 2004 classification, with the salary of Lettering Machine Operator performing the classification of Sign Shop Supervisor.

Later that same day Mr. Pedro, who was going to give me the check, looked at the amount and informed me that there was an error in the amount, then because of the Juan Pérez Colón lawsuit that we won, we realized that the check, the amount was the correct amount of \$53,010.00 gross salary and net \$42,470.10.

I was paid \$2,470.65 on December 10, 2004. From this check I am owed the amount of:

\$53,010.00
- \$2,470.65
\$50,539.35

TO: *Rosana Rosario Otero*
Director of the *Human Resources* Office
4th floor, South Tower, Minillas
Santurce. PR 00940

FROM: Felix Rivera Clemente
Traffic Regulation Sign Shop Supervisor

SUBJECT: Salary differential, incorrect amount paid [signature] [handwritten:] (*Violation of agreement*) *SPU-2004, Article XIX from September 10, 1991 to August 16, 2004.*

DATE: June 6, 2012

On May 10, 2005, for the differential payment of August 16, 2004, retroactive to September 10, 1991, a correct payment of \$53,010.00 was made to me at the Industrial Relations Office in the basement of the South Tower in Minilla. Later that same day Mr. Pedro, who was going to give me the check, looked at the amount and informed me that there was an error in the amount, then because of the Juan Pérez Colón lawsuit that we won, we realized that the check, the amount was the correct amount of \$53,010.00 gross and net salary of \$42,470.10.

I was paid \$2,470.65 on December 10, 2004. From this check I am owed the amount of:

\$53,010.00

- \$2,470.65

\$50,539.35

[handwritten:] *I gave the letters above to the receptionist to give them to Maria Santiago in order to certify the calculations and send them to the finance office.*

[logo:] Commonwealth of Puerto Rico
dtop **DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS**
P.O. Box 41289 Minillas Station, Santurce, Puerto Rico 00940 - 1289

Address all Official Communications to
**SECRETARY OF TRANSPORTATION AND
PUBLIC WORKS**

No.
Please mention this number when referring to
this matter.

March 25, 1997

[handwritten:] *I qualified as a computer
operator. I was told no, because the salary
was too high.*

Mr. Félix Rivera Clemente
Lettering Machine Operator
Traffic Signals Division

REFERENCE: CLASSIFICATION AND COMPENSATION PLAN

Dear Mr. Rivera:

Effective April 1, 1995, as a result of the implementation of the
Classification and Compensation Plan of this Department, Position
Number 8406 that you occupy was classified as a Traffic Sign Painter
and was assigned a salary of \$875.00 per month.

By means of a communication dated August 4, 1995, you objected to the
assigned classification, requesting that an administrative hearing be
held in accordance with the procedures for the review process.

Our Human Resources Office proceeded with the administrative hearing
and after analyzing your case, we requested the creation of the class
of Letter Design Machine Operator, which was duly approved by the
Central Office of Personnel Administration (OCAP).

Based on the foregoing, we are informing you that the position you
hold was classified as Letter Design Machine Operator and the assigned
salary shall be of \$880.00 per month.

If you do not agree with this decision, you will have to appeal same
before the Personnel Administration System Appeals Board (JASAP),
located at Calle [illegible], Number 153, San Juan, Puerto Rico,
within thirty (30) days from the receipt of this notice.

Sincerely yours,

[signature].
Carlos I. Pesquera
Secretary

[handwriting along the side:]
[illegible]
10:00 AM because [illegible] at any time
Friday May 3, 2006
I requested the money.
Saturday May 4, 2006 They told me to pick it up

[handwriting at the bottom:]
Monday, May 27, 2006
I called saying that I can't go,
they told me [illegible]

[DTOP LOGO]

COMMONWEALTH OF PUERTO RICO
DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS

May 6, 2005

Mr. Félix Rivera Clemente
HC-01 Box 7630
Loiza, P. R. 00772

Dear Mr. Rivera:

REFERENCE CLASSIFICATION PLAN

Effective August 16, 2004, as a result of the implementation of this Department's Classification and Compensation Plan, your position was classified as Traffic Sign Shop Supervisor and assigned a salary of \$1,760.00 per month.

By means of a communication dated September 7, 2004, you objected in writing to the classification and compensation assigned in accordance with the procedures established for the review process.

The Review Committee proceeded with the analysis of your claim and after reviewing your case found that the classification and compensation were correctly assigned.

In view of the foregoing, we are confirming the classification and compensation assigned, of which you were notified by way of letter dated August 16, 2004.

If you do not agree with this Decision, you must appeal to the Public Service Human Resources Administration Appeals Commission (formerly JASAP), located at 153 San Justo Street, Old San Juan, Puerto Rico, within a term not to exceed 30 days from the receipt of this notice.

Sincerely yours,

[signature].
Mabel Ortiz Flores
President
Review Committee

[signature].
Gabriel D. Alcaraz Emmanuelli, Ph.D.
Secretary

msr

P.O. Box 41269. San Juan, Puerto Rico 00940 - 1269 - Tel. (787) 722-2929 Fax: (787) 728-8963

ORHELA-CMC-6
May 2006

[logo] ORHELA

Commonwealth of Puerto Rico
OFFICE OF HUMAN RESOURCES OF THE COMMONWEALTH OF PUERTO RICO
Conflict Mediation Center
PO Box 8476, San Juan, PR 00910-8476

MEDIATION NOTICE

Felix Rivera Clemente
Appellant

2007-05-1167-465
CMC CASE NO.

Vs.

2007-05-1167
CASARH CASE NO.

DTOP
Appellee

July 19, 2007
Date

Felix Rivera Clemente
Appellant
HC-01 Box 9045
Loiza, PR 00772

Sarah D. Irizarry
Name of Case Mediator

Dear Mr. Rivera:

This case was referred to our Mediation Center by CASARH. We are summoning you for the mediation proceeding on **August 16, 2007**, at **10:00 a.m.** at our facilities.

If you are unable to attend this appointment, if you resolve the situation before the appointment, or if you have any questions, you may contact the Center at **(787) 781-4300, extensions 2201 or 3050**.

Cordially yours,

[signature].
Sarah D Irizarry Cruz, Mediator
Assistant Director of the Center
or Authorized Person

FOR USE BY THE CONFLICT MEDIATION CENTER

Sent by: ☐ Personal ☐ Mail ☐ Other _____

☐ The name of a legal representative was not submitted to the Center by the aforementioned person.

☐ A copy of this summons was forwarded to the legal representative of the person at the following address:

[handwritten:] Monday, March 7, 2011

Vásquez Graciani & Rodríguez, Law Office.

FELIX RIVERA CLEMENTE

APPELLANT

VS.

**DEPARTMENT OF TRANSPORTATION AND
PUBLIC WORKS**

APPELLEE

**Civil Case No.
2007 05 1167**

Transfer

Subject

New Legal Representation

Although the appellate commission has not notified me again of the other change of legal representation, I will not accept the meeting that you are inviting me to, for March 18, 2011 at 11:00 am in the new conference room, unless it is held at the Public Service Human Resources Management System appellate commission before a representative of the commission. That is the only place I will accept a meeting with you where this case is being heard. Outside of that, since I do not have legal representation, I do not agree to meeting elsewhere.

And in relation to the case, we are at the stage that Antonia I. Garcia Matos, Esq. has already sent the documents to the Human Resources Office of the Department of Transportation and Public Works to make the necessary changes in my salary and to pay me the money for damages since everything is correct.

The resolution of the civil case no. 2007-05-1167 that I, Felix Rivera Clemente, recommend is based on the Reclassification of August 16, 2004, where Carlos R. Roman Vizcarrondo obtained the appointment of Supervisor of Sign Shops by means of lies when I was the only supervisor of the Sign Shop before that time, which when the transfer problem happened in May 2007 when the PAE social worker Aida Iris Rossy, in order to benefit the sign maker Angel R. Boria Figueroa, called the Director Manuel Salcedo, saying that for my safety they had to transfer me from the Sign Shop to another office through a plan already agreed upon beforehand by some of them when the PAE Office is to assist employees with alcohol and drug problems and then they sent me to a psychologist for some tests without there being a need to go through all that, this not being the first or the last supervisor who had problems with a subordinate.

TO: Rosana Rosario Otero
Director of the Human Resources Office

FROM: Felix Rivera Clemente
Traffic Regulation Sign Shop Supervisor

SUBJECT: [signature] **Salary differential from when my classification changed from
Worker II to Lettering Machine Operator, and that I was not paid.**

DATE: June 4, 2012

[stamp:] [illegible] [signature]
2012 JUN -5 AM 1:05

I changed classification on September 10, 1991, from Worker II to Letter Design Machine Operator, until April 1, 1995, due to the implementation of the classification and compensation plan of the Department of Transportation and Public Works from a Worker II salary of \$589.00 changed to \$880.00 which is the salary of Letter Design Machine Operator with a differential of \$291.00. I was never paid that, and therefore I am owed a differential for that time of four (4) years and 16 days, September 10 through January 31, 1996. I am owed a differential for that time of \$15,277.50.

I await your prompt attention to this matter, since when I started, I was not aware of this payment and the directors and personnel managers never made reference to it.

COMMONWEALTH OF PUERTO RICO
APPELLATE COMMISSION OF THE PUBLIC SERVICE
HUMAN RESOURCES MANAGEMENT SYSTEM

FELIX RIVERA CLEMENTE	Civil Case No.: 2007 05 1167
APPELLANT	TRANSFERS
VS.	SUBJECT
DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS	
APPELLEE	

MOTION REQUESTING DISMISSAL WITH PREJUDICE

TO THE HONORABLE APPELLATE COMMISSION:

The Department of Transportation and Public Works, hereinafter referred to as the DTOP, appears before this Honorable Forum through its undersigned legal representative, and respectfully **ALLEGES, STATES, AND REQUESTS:**

1. On May 15, 2007, Mr. Félix Rivera Clemente filed a document called Request for Appeal and Voluntary Request for Mediation Service (On His Own Behalf).
2. In the eleventh (11th) statement on the challenged action, the appellant alleged the following: "Transfer, change in functions."
3. In the twelfth (12th) statement entitled Appeal or Remedy Requested [*Súplica o Remedio Solicitado*], he indicates: "That the functions previously acquired be returned to me."
4. On July 23, 2007, Ariel Félix Cintrón, Esq. filed an Informational Motion in Request for Documents before the Honorable Appellate Commission of the Public Service Human Resources Administration System, hereinafter referred to as CASARH.
5. On August 29, 2007, the Office of Human Resources of the Commonwealth of Puerto Rico, Conflict Mediation Center, issued a Report on the Outcome of the Mediation Service. The case was closed and mediated without agreement. Signed by Mr. Felix Rivera Clemente, appellant, Atty. Ariel Félix Cintrón, representative of the appellee DTOP, Mrs. Sarah D. Irizarry Cruz, mediator, and the [*incomplete – cut off*]

VÁZQUEZ GRAZIANI
& RODRÍGUEZ
LAW OFFICES

Edif. Doral Bank, Suite 805
Calle Resolución #33
San Juan, PR 00920-2717

Tel. (787) 783-4445
Fax: (787) 783-6250
E-mail vazgra@vgrlaw.com

March 3, 2011

Mr. Félix Rivera Clemente
HC-01 Box 9045
Loiza, Puerto Rico 00772

Re: FELIX RIVERA CLEMENTE vs. DTOP, APPEAL #2007-05-1167

Dear Mr. Clemente:

The undersigned attorney, as part of the law firm of Vázquez Graziani & Rodríguez, is counsel in the above-captioned matter. In accordance with the Order issued by the Public Service Appellate Commission on January 26, 2011, regarding the preparation of the Pre-Hearing Conference Report, it is necessary for the parties to meet.

Therefore, I invite you to meet on Friday, March 18, 2011, at 11:00 a.m. in the new conference room located on the 17th Floor of the Legal Counsel's Office at the Department of Transportation and Public Works, Roberto Sánchez Vilella Building, Santurce, Puerto Rico.

For this meeting, both parties must identify the relevant documentary evidence to be presented at the hearing and also exchange a list of the witnesses that each party will present at the hearing.

Please confirm your availability for the meeting.

Sincerely yours,

[signature].

Glorimar Acevedo Cruz

[logo:] dtop
COMMONWEALTH OF PUERTO RICO
DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS

May 25, 2007

Mrs. Ivette Cartagena Rivera
Director
Human Resources Office
[signature]
Felix Rivera Clemente
Sign Shop Supervisor
Traffic Regulation Office

[stamp:] [illegible] [illegible]
HUMAN RESOURCES
[signature].
2007 May 25 pm 2 [illegible] 3

ADMINISTRATIVE DECISION REFERRAL

On May 8, 2007, I wrote a memo to Angel R. Boria due to insubordination, excessive use of cell phones during work hours, disappearing or being absent from the shop occasionally without authorization, and threats. After this situation, Director Manuel Salcedo Ortega made the administrative decision that I, Felix Rivera Clemente, Supervisor of the Sign Shop, could not give instructions to the sign makers; I have to give instructions to Carlos R. Roman Vizcarrondo who is in Benjamin Rivera's office doing project closing work so that he could come to the Sign Shop to give instructions to the sign makers.

I look forward to your prompt intervention in this matter.

c.f.: Ing. Manuel Salcedo Ortega

P.O. Box 41269. San Juan, Puerto Rico 00940 - 1269 - Tel. (787) 722-2929 Fax: (787) 728-8963

COMMONWEALTH OF PUERTO RICO
TRIAL COURT
SUPERIOR COURT OF SAN JUAN

May 10 2022

JUAN PEREZ COLON, ET AL.

CIVIL NO. KAC-90-487 (905)

Claimants

IN RE:

VS.

CLAIM FOR WAGES AND DECLARATORY
JUDGMENT

COMMONWEALTH OF PUERTO RICO AND
OTHERS

Respondents

**JOINT MOTION REQUESTING THE ISSUANCE OF A PARTIAL RESOLUTION IN PAYMENT OF
JUDGMENT AND NOTICE OF STIPULATED CALCULATIONS UNTIL SEPTEMBER 2000 AND ON
ADDITIONAL PROCEDURES.**

TO THE HONORABLE COURT.

The plaintiffs, represented by their respective undersigned counsel, appear and respectfully submit and request before this Honorable Court:

At the follow-up hearing held on February 1, 2007, this Honorable Court was informed that after a thorough verification and comparison process, the appellant accepts as correct the calculations reported on the wages owed to the appellants. However, since the DTOP submitted the calculations report up to September 2000, it was clarified that the same would be accepted, to the effect that a Partial Resolution be issued and a term of 120 days be granted to the Department of Public Works (DTOP) to complete and update said calculations up to the present, and this honorable Court issued the corresponding Order. In addition, it ordered the agency to proceed to correct the change reports of the individual employees so that the corresponding salary adjustments would be made.

The names, social security and individual amounts due through September 2000 are identified below. In addition, the names of some claimants whose calculations remain unaccounted for because the files have not been located are listed.

	NAME	SOCIAL SECURITY	AMOUNT OWED up to September 2000 [1st PAYMENT]
1.	ABRIL VELEZ, BENNY	2192	\$ 16, 023.
2.	ACEVEDO HERNANDEZ, ANGEL L.	8332	\$ 4, 340
3.	ADORNO AGOSTO, ANDRÉS	2428	\$ 4, 108.
4.	ADORNO AGOSTO, PABLO	8553	\$ 11, 538.50
5.	ADORNO MERCED, WILFREDO	8949	\$ 10, 111.
6.	ADORNO OJEDA, AGUSTIN	3512	\$ 13, 611.50
7.	AGOSTO AGOSTO, PEDRO	2378	\$ 10, 777.
8.	AGOSTO MENDEZ, WANDA	8798	\$ 21, 484.50
9.	AGOSTO ORTIZ, RAFAEL	0359	\$ 11, 471.
10.	AGOSTO ROSADO, BIENVENIDO	8805	\$ 13, 906.50

[stamp in left margin:]

COMMONWEALTH OF PUERTO RICO
TRIAL COURT
SUPERIOR COURT OF SAN JUAN
GENERAL COURT OF JUSTICE

[...] over the years have unsuccessfully filed multiple petitions through administrative channels for the reinstatement of their salary in accordance with the rate of pay set in the pay scale, the remedy being inadequate due to the slowness and the defendants' pattern of non-compliance with the law.

VI. RELIEF SOUGHT

31. The plaintiff requests that the plaintiff class be paid the difference in unpaid wages, as well as the fringe benefits to which they are entitled and that they be compensated for the damages described above. In addition, that their attorneys' fees be paid as prescribed by Section 282 of Law 379, supra, Title 29 L.P.R.A., that this action be certified as a class action, pursuant to the provisions of Rule 20.3 (a) of Civil Procedure and that any other relief due under the law be granted.

WHEREFORE, it is respectfully requested that the present complaint be GRANTED.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, November 1990.


I CERTIFY: That, on this date, I am sending a true and exact copy of this document to Luis R. Viera Zayas, Esq. P.O. Box 192, San Juan, Puerto Rico, 00902.

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TRIAL COURT
SUPERIOR COURT OF SAN JUAN
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TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
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I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

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Signed this 10th day of August 2021



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A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

